

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
TIERRA MONET MARSHALL	)	Case No. 21-31017-KLP
	)	Chapter 7
Debtor	)	

**MOTION FOR EXTENSION OF TIME FOR FILING REAFFIRMATION AGREEMENT**

COMES NOW the Debtor, by counsel, and files this Motion to extend the time for the filing of a Reaffirmation Agreement, and in support hereof states unto the Court as follows:

1. The Debtor filed the Chapter 7 petition herein on April 13, 2021.
2. The Debtor's Statement of Intention indicates a desire to reaffirm a car loan with Exeter Finance LLC.
3. Exeter Finance LLC has provided Debtor's counsel with a Reaffirmation Agreement for the Debtor to execute and the counsel is waiting on the Debtor to sign the document.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order to extending the time for the filing of a Reaffirmation Agreement, and for such other relief as the Court may deem appropriate.

James E. Kane (VSB #30081)  
KANE & PAPA, P.C.  
P.O. Box 508  
Richmond, VA 23218  
(804) 225-9500 (phone)  
(804) 225-9598 (fax)  
[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)  
*Counsel for Debtor*

Respectfully submitted,

TIERRA MONET MARSHALL

By: /s/ James E. Kane  
Counsel

James E. Kane (VSB #30081)  
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[jkane@kaneandpapa.com](mailto:jkane@kaneandpapa.com)  
*Counsel for Debtor*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 2, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane  
James E. Kane

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TIERRA MONET MARSHALL	)	Case No. 21-31017-KLP
	)	Chapter 7
Debtor	)	

**NOTICE OF MOTION**

The above Debtor has filed a Motion to extend the time for the filing of a Reaffirmation Agreement.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then within seven (7) days from the date of this Notice, you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court  
United States Bankruptcy Court  
701 East Broad Street  
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire  
Kane & Papa, P.C.  
P.O. Box 508  
Richmond, Virginia 23218

- Attend a hearing to be scheduled by the Court. You will receive a separate notice of hearing. If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

TIERRA MONET MARSHALL

By: /s/ James E. Kane  
Counsel

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/s/ James E. Kane  
James E. Kane

AssetCare  
Attn: Bankruptcy  
Po Box 1127  
Sherman, TX 75091

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130

Cnac Of Richmond  
7400 Midlothian Pike  
Richmond, VA 23235

Exeter Auto Finance  
PO Box 66008  
Irving, TX 75016

Gilliam & Mikula, PLLC  
804 Moorefield Park Drive  
Suite 200  
Richmond, VA 23236-3671

Integrated Automobile Finance  
4505 West Broad Street  
Richmond, VA 23230

Internal Revenue Service  
Centralized Insolvency Operati  
P. O. Box 7346  
Philadelphia, PA 19101-7346

Lab Corp  
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Burlington, NC 27216

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Roanoke, VA 24018

Ortho Virginia  
PO Box 35725  
Richmond, VA 23235

Peoples Advantage Fe  
Attn: Bankruptcy  
Po Box 3180  
Petersburg, VA 23805

Professional Debt Mediation  
Attn: Bankruptcy  
7948 Baymeadows Way, 2nd Floor  
Jacksonville, FL 32256

Usdoe/Glelsi  
Attn: Bankruptcy  
Po Box 7860  
Madison, WI 53707

Verizon  
Verizon Wireless Bk Admin  
500 Technology Dr Ste 550  
Weldon Springs, MO 63304

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